

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM, LLC
8985 South Eastern Ave., Suite 100
Las Vegas, NV 89123
Phone: (702) 880-5554
FAX: (702) 385-5518
Email: info@freedomlegalteam.com
Attorneys for Plaintiff Alexander Ferrari

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Alexander Ferrari,

Plaintiff,

v.

Equifax Information Services, LLC;
and Bank of America, N.A.

Defendants.

Case No.: 2:23-cv-00453-APG-NJK

**Discovery Plan and Scheduling
Order Submitted in Compliance
with LR 26-1(b)**

On May 10, 2023 defendant Bank of America, N.A., appeared in this case. On May 18, 2023 defendant Equifax Information Services, LLC appeared in this case. On June 6, 2023 Plaintiff filed his Notice of Settlement with Equifax Information Services, LLC. ECF No. 17.

The Court set a deadline to file a proposed discovery plan and scheduling order by June 24, 2023. Counsel for Alexander Ferrari and Bank of America, N.A.; (collectively as the “Parties”) met and conferred as required under Rule 30(b)(6) on

June 13, 2023. The parties, by and through their respective counsel, hereby submit this Joint Discovery Plan and Scheduling Order. The parties will require 180 days of discovery measured from the date that Bank of America, N.A. filed its answer to Plaintiff's complaint.

DISCOVERY PLAN

The parties propose the following discovery plan and scheduling order:

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|---|--------------------|
| 1. Initial disclosures | June 27, 2023 |
| 2. Amend pleadings and add parties .. | July 13, 2023 |
| 3. Expert disclosures (initial): | August 14, 2023 |
| 4. Expert disclosures (rebuttal): | September 13, 2023 |
| 5. Discovery cutoff date: | November 6, 2023 |
| 6. Dispositive motions: | December 6, 2023 |
| 7. Pretrial order | January 5, 2024 |

In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until **30 days after** decision on the dispositive motions or until further order of the court.

Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

Extensions or Modifications of the Discovery Plan and Scheduling Order: Applications to extend any date set by the discovery plan, scheduling order, or other order must comply with the Local Rules.

Protective Order: The parties may seek to enter a stipulated protective order pursuant to Rule 26(c) prior to producing any confidential documents.

1 Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and
2 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be
3 served by sending such documents by email.
4

5 Alternative Dispute Resolution Certification: The parties certify that they met
6 and conferred about the possibility of using alternative dispute-resolution processes
7 including mediation, arbitration, and early neutral evaluation. The parties have not
8 reached any stipulations at this stage.
9

10 Alternative Forms of Case Disposition Certification: The parties certify that
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).
13 The parties have not reached any stipulations at this stage.
14

15 Electronically Stored Information: The parties have discussed the retention
16 and production of electronic data. The parties agree that service of discovery by
17 electronic means, including sending original electronic files by email or on a cd is
18 sufficient. The parties reserve the right to revisit this issue if a dispute or need arises.
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1 Electronic evidence conference certification: The parties further intend to
2 present evidence in electronic format to jurors for the purposes of jury deliberations
3 at trial. The parties discussed the presentation of evidence for juror deliberations but
4 did not reach any stipulations as to the method as this early stage.
5

6 Dated: June 13, 2023.
7

8 **FREEDOM LAW FIRM**

9 /s/ Gerardo Avalos
10 Gerardo Avalos, Esq.
11 8985 South Eastern Ave., Suite 100
12 Las Vegas, NV 89123
13 *Counsel for Plaintiff Alexander Ferrari*

14 **Akerman, LLP**

15 /s/ Lilith V. Xara
16 Melanie D. Morgan, Esq.
17 Scott R. Lachman, Esq.
18 Lilith V. Xara, Esq.
19 1635 Village Center Circle, Suite 200
20 Las Vegas, Nevada 89134
21 *Counsel for Defendant Bank of America,*
22 *N.A.*

23 **ORDER**

24 **IT IS SO ORDERED.**

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UNITED STATES MAGISTRATE JUDGE

Dated: June 14, 2023